

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: SEP 14 1989

SUBJECT: Final Request for ARARs for NL Industries/Taracorp Site in Granite City, Illinois

FROM: Brad Bradley, RPM BB
IL/IN Unit #3

TO: Addressees

The Draft Preliminary FS Report for the NL Industries/Taracorp Site in Granite City, Illinois was distributed to you last week. Please provide a final list of all ARARs for your program pertaining to this site by September 29, 1989. The enclosed checklist will help you in this process.

Of particular concern at this site is how the RCRA land ban will affect the cleanup alternatives. A clear understanding must be realized since, with the exception of the no action alternative, all alternatives under final consideration involve consolidating/capping/disposal of the lead waste pile.

Thank you for your cooperation. Please contact me at (312) 886-4742 if you have any questions.

Addressees:

Ken Miller, IEPA
T. Ballard, 5WD-TUB-08
J. Kleiman, 5HR-13
F. Wrightsell, 5AP-26

Enclosure

EPA Region 5 Records Ctr.



257749

RCRA PERMITTING BRANCH
POTENTIAL RCRA ARARS

Location	Citation	N/A	Review Requested	Comments
Within 200 feet of fault zone	40CFR 264.18a	✓		
Within 100-yr floodplain	40CFR 264.18b		✓	
Within salt dome formation, under- ground mine or cave	40CFR 264.18c	✓		
<u>Action</u>				
Capping/Closure with waste in-place	40CFR 264.228a .258b .310a .228a .117c .228b .310b		✓	
Closure with no post-closure care (clean closure)	40CFR 264.111 .178 .197 .288o .258	✓		
Closure with waste in-place	40CFR 264.228 .258b .310		✓	
Closure of land treatment units	40CFR 264.280	✓		
Consolidation within a Unit		X		
Consolidation between Units			✓	

Action	Citation	N/A	Review Requested	Comments
Container storage	40CFR 264.171 .172 .173 .174 .175 .176 268.50	✓		
Construction of new landfill on-site -minimum technology -gw monitoring	40CFR 264.301 .303 .304 .310 .91- .100		✓	
Construction of new surface impoundment -minimum technology -gw monitoring	40CFR 264.220 .221 .91- .100	✓		
Dike stabilization	40CFR 264.221 .226 .227 .228	✓		
Discharge to public-ally owned treatment works	40CFR 270.60	✓		
Excavation	40CFR 268		✓	
Groundwater diversion		✓		
Incineration	40CFR 264.341 .351 .340 .343 .342 .345	✓		
Land treatment	40CFR 264.271 .273 .276 .278 .281 .283	✓		

Action	Citation	N/A	Review Requested	Comments
Operation & Maintenance	40CFR 264.310		✓	
Placement of liquid waste in landfill	40CFR 264.314	✓		
Placement of waste in land disposal unit	40CFR 268		✓	
Slurry wall		✓		
Surface water control	40CFR 264.251 .273 .301 .221c	NA	✓	
Tank storage	40CFR 264.190 .191 .193- .198 268.50	✓		
Treatment(in a unit)	40CFR 264.190- .192 .221 .251 .273 .343- .345 .601 .373		✓	
Treatment(when waste will be land disposed	40CFR 268.10- .12 .41 268 51FR 40641 52FR 25760 40CFR 268.30		✓	
Underground injection	40CFR 268.2	✓		
Waste pile	40CFR 264.251 268.2		✓	

Chemical Specific	Citation	N/A	Review Requested	Comments
Maximum concentra- tion limits	40CFR 264.94		✓	

**WATER DIVISION
POTENTIAL ARARs**

<u>Location</u>	<u>Citation</u>	<u>N/A</u>	<u>Review Requested</u>	<u>Comments</u>
Wetlands	CWA 404 40CFR 230 33CFR 320- 330 40CFR 6 EO 11988 EO 11990	✓		
<u>Action</u>				
Discharge of treatment system effluent	40CFR 122.44 125.100 .104 122.41i 136.1- 136.4	✓		
Discharge to publically owned treatment works	40CFR 403.5+ local regula- tions	✓		
Discharge of dredge and fill material to waters of the U.S.	40CFR 230 33CFR 320- 330	✓		
Dredging	33 USC 403 33CFR 320- 330	✓		
Underground inject- ion of wastes and treated groundwater	40 CFR 144.12 .13 .16 .28b .51 .28g .55 146.4 144.28e 146.12d .13 147	✓		

Chemical Specific	Citation	N/A	Review Requested	Comments
SDWA Maximum Contaminant Levels	40CFR 141.11- .16		✓	
CWA water quality criteria	CWA 304 51 <u>FR</u> 43665		✓	

**AIR & RADIATION DIVISION
POTENTIAL ARARS**

Action	Citation	N/A	Review Requested	Comments
Air stripping	CAA 109 110 111 112 107 40CFR 51.160- .164 60.50 52 51.166	✓		
Thermal destruction	CAA 109 110 111 112 107 40CFR 51.160- .164 60.50 52 51.166	✓		
Soil handling	CAA 109 110 111 112 107 40CFR 51.160- .164 60.50 52 51.166 UMTRCA 40CFR 192		✓	
Gaseous waste treatment	CAA 109 110 111 112 107 40CFR 51.160- .164 60.50 52 51.166	✓		

<u>Chemical Specific</u>	<u>Citation</u>	<u>N/A</u>	<u>Review Requested</u>	<u>Comments</u>
National Ambient Air Quality Standards	CAA 109 40CFR 50		✓	
National Emissions Standards for Hazardous Air Pollutants	CAA 112 40CFR 61	✓		
New Source Perform- ance Standards	CAA 111 40CFR 60	✓		
Radiation Control	UMTRCA 40CFR 192	✓		

ENVIRONMENTAL SCIENCES DIVISION
POTENTIAL ARARs

<u>Location</u>	<u>Citation</u>	<u>N/A</u>	<u>Review Requested</u>	<u>Comments</u>
New PCB landfill	TSCA 6 40CFR 761	✓		
<u>Action</u>				
Construction of a PCB landfill on- site	40CFR 761.75	✓		
Discharge of dredge and fill material containing PCBs	40CFR 761.60	✓		
Incineration of PCBs	40CFR 761.70	✓		
Treatment/ disposal of PCBs	40CFR 761.60	✓		
Storage of PCBs	40CFR 761.65	✓		

OTHER POTENTIAL ARARs

Location	Citation	N/A	Review Requested	Comments
Within floodplain	Fish & Wildlife Coordination Act(FWLCA)		✓	
Within area where action may cause irreparable harm, loss, or destruction of significant artifacts	National Historic Preservation Act(NHPA) 36CFR 65	✓		
Historic project owned or controlled by Federal agency	NHPA 36CFR 800	✓		
Critical habitat upon which endangered species or threatened species depends	Endangered Species Act of 1973 50CFR 200 402 FWLCA 33CFR 320-330	✓		
Wetlands	33CFR 320-330	✓		
Wilderness area	Wilderness Act 50CFR35.1	✓		
Wildlife refuge	50CFR27	✓		
Area affecting stream or river	Wild & Scenic Rivers Act 40CFR 6.302a	✓		